

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE APPLICATION OF ZOUZAR BOUKA;	)	
VISION INDIAN OCEAN S.A.;	)	
AND VIMA REAL ESTATE S.A.R.L.	)	
FOR AN ORDER DIRECTING DISCOVERY FROM	)	
SYMBION POWER SERVICES U.S., INC.;	)	Case No. 1:22-mc-00092 RA-GWG
SYMBION POWER LLC;	)	
SYMBION POWER HOLDINGS LLC;	)	
SYMBION POWER AFRICA, LLC;	)	
SYMBION ENERGY HOLDINGS LTD.; AND	)	
PAUL HINKS	)	
PURSUANT TO 28 U.S.C. § 1782	)	
	)	

**SUPPLEMENTAL DECLARATION OF ZOUZAR BOUKA IN FURTHER SUPPORT  
OF AN APPLICATION FOR AN ORDER TO CONDUCT DISCOVERY FOR USE IN A  
FOREIGN PROCEEDING PURSUANT TO 28 U.S.C. § 1782**

1. I submit this supplemental declaration in further support of Applicants' application for discovery pursuant to 28 U.S.C. § 1782.
2. 3. On 2 March 2020, Alexander Oppenheim (copying Eytan Stibbe) instructed me to prepare a criminal complaint on behalf of Symbion Power Mandroseza SARL ("SPARL") for the 59 illegal money transfers that Mirela Comaniciu made acting on behalf of and for the interests of Paul Hinks. A true and correct copy of Mr. Oppenheim's email is hereto as **Exhibit 1**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Antananarivo on this 6<sup>th</sup> day of May, 2022.



Zouzar Bouka